



State of Ohio Environmental Protection Agency

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George V. Voinovich
Governor

March 17, 1999

RE: DOE FEMP
COMMENTS: REPORT ON
CONTROLLING MAMMALIAN
BROWSING

Mr. Johnny Reising
U.S. Department of Energy, Fernald Area Office
P.O. Box 538705
Cincinnati, OH 45253-8705

Dear Mr. Reising:

Ohio EPA has reviewed the DOE's February 16, 1999 submittal, "Implications of Reforestation: Controlling Mammalian Browsing and Competing Vegetation" Based upon our review Ohio EPA has the attached comments.

If you have any questions, please contact me at (937) 285-6466.

Sincerely,

Thomas A. Schneider
Fernald Project Manager
Office of Federal Facilities Oversight

cc: Jim Saric, U.S. EPA
Terry Hagen, FDF
Ruth Vandegrift, ODH
Manager, TPSS/DERR, CO
Mark Shupe, HSI GeoTrans
Francie Barker, Tetra Tech EM Inc.



**IMPLICATIONS OF REFORESTATION:
CONTROLLING MAMMALIAN BROWSING AND COMPETING VEGETATION**

- 1) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: Pg #: Line #: Code: C
Original Comment #:
Comment: This review appeared to be rambling and did not clearly point to any direction that the literature may have favored. Additionally, it lacked in the basic assessment of facts or findings from the literature reviewed. Page 4 mentions that chemical repellents are either ineffective or reduce damage slightly, but there is no reference attached to this statement. There is no conclusion that "...X is best because...and avoid Y because..." These kinds of assessments would have resulted in the document being useful in restoration work at Fernald.
-) Commenting Organization: Ohio EPA Commentor: DSW
Section #: Pg #: 1 & 2 Line #: Code: E
Original Comment #:
Comment: "effect" is used when "affect" should be used.
-) Commenting Organization: Ohio EPA Commentor: DSW
Section #: Pg #: 2 Line #: Code: C
Original Comment #:
Comment: In the discussion of factors affecting browsing, there is no mention of migratory routes. Is this an omission or are they not important in browsing? Additional review of literature in this area is warranted.
-) Commenting Organization: Ohio EPA Commentor: DSW
Section #: Pg #: 2 Line #: Code: C
Original Comment #:
Comment: It is stated that deer browsing woody twigs may be an impediment to reforestation projects but there is no significant detail as to how. More detail on causes/solutions is needed.
-) Commenting Organization: Ohio EPA Commentor: DSW
Section #: Pg #: 3 Line #: Code: E
Original Comment #:
Comment: The sentence after "(Kittredge et al 1992)." appears to be the beginning of the next paragraph although it is the following sentence that is used to begin the paragraph.
-) Commenting Organization: Ohio EPA Commentor: DSW
Section #: Pg #: 4 Line #: Code: C
Original Comment #:
Comment: Please define "stems per acre"?
-) Commenting Organization: Ohio EPA Commentor: DSW
Section #: Pg #: 4 Line #: Code: C
Original Comment #:
Comment: What is a traditional agricultural fence that is 8' high? Some illustrations, photos or

diagrams would be helpful with some of this information. Most agricultural fence is significantly shorter than 8'.

- 8) Commenting Organization: Ohio EPA Commentor: DSW
Section #: Pg #: 4 Line #: Code: C
Original Comment #:
Comment: The statement on the bottom of this page that gives some data (e.g. browsing <40%, no reaction to non-predator urines) is the kind of information I would expect to see but appears to be lacking in this review.
- 9) Commenting Organization: Ohio EPA Commentor: DSW
Section #: Pg #: 5 Line #: Code: C
Original Comment #:
Comment: The second paragraph on this page states that "each technique has its own advantages and disadvantages.." and never really discusses any of these in any detail. Ohio EPA would expect this to be the kind of information most important in this review. Without it the review seems to be worth very little. A table included in the report summarizing pros and cons would be most useful to future planning efforts.
- 10) Commenting Organization: Ohio EPA Commentor: DSW
Section #: Pg #: 5 Line #: Code: E
Original Comment #:
Comment: "synthesize" should read "synthesis".
- 11) Commenting Organization: Ohio EPA Commentor: DSW
Section #: Pg #: 6 Line #: Code: C
Original Comment #:
Comment: The top of this page starts to talk about mulches but without references or comparisons. Nowhere are the conditions of mice and other herbivorous mammals that may use mulches for cover discussed.
- 12) Commenting Organization: Ohio EPA Commentor: DSW
Section #: Pg #: 6 & 7 Line #: Code: C
Original Comment #:
Comment: "Excessive herbaceous removal" is mentioned without mentioning what the limits of "acceptable" removal might be. Discussion of ranges, damages etc seems appropriate here.
- 13) Commenting Organization: Ohio EPA Commentor: DSW
Section #: Pg #: Line #: Code: C
Original Comment #:
Comment: The review seems to be missing key articles. For example much work was done by Jonas Bergquist but there is no reference to his work.